



July 19, 2019

Ex Parte Notification

Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: In the Matter of Federal-State Joint Board on Universal Service Lifeline and Link Up and Modernization, WC Docket 11-42

Dear Ms. Dortch,

On July 19, 2019, the undersigned on behalf of TCA spoke by phone with Nicholas Page in the Wireline Competition Bureau. The purpose was to discuss the Universal Service Administrative Company's (USAC) implementation of the Lifeline Representative Accountability Database (RAD).

Specifically, TCA shared our client's concerns with the RAD's requirement that employees of rural local exchange carriers (RLECs) provide personally identifiable information (PII) to register. RLECs are required to offer Lifeline as ETCs and TCA's clients typically use direct employees rather than contractors. This would put RLECs in the position of requiring employees to hand over potentially highly sensitive PII to USAC in order for the ETC to be compliant with its designation. TCA also discussed whether potential differences are needed for controls between direct employees and contractors that may work with several ETCs at one time.

TCA supports accountability in the Lifeline program to ensure rules are followed but urges the Commission to pause to the implementation of RAD until a solution can be reached that does not require RLEC employees to provide PII.

Any questions about the information in this filing may be directed to the undersigned. Pursuant to Section 1.1206 of the FCC's rules, this letter is being filed electronically via ECFS.

Thank you for your attention in this matter.

Sincerely,

/s/ Stacey Brigham

Stacey Brigham
Regulatory Director
TCA, Inc.

CC: Nicholas Page